

**REDACTED**

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

|                                    |   |                            |                  |
|------------------------------------|---|----------------------------|------------------|
| UNITED STATES OF AMERICA,          | ) | INDICTMENT                 | CR 11-317SRN/TNL |
|                                    | ) |                            |                  |
| Plaintiff,                         | ) | (18 U.S.C. § 2)            |                  |
|                                    | ) | (18 U.S.C. § 2232(a))      |                  |
| v.                                 | ) | (21 U.S.C. § 841(a)(1))    |                  |
|                                    | ) | (21 U.S.C. § 841(b)(1)(C)) |                  |
| 1. ROBERTO JESUS AMIGON-ARAGON and | ) | (21 U.S.C. § 846)          |                  |
|                                    | ) | (21 U.S.C. § 853)          |                  |
| 2. MIGUEL MORAN-HELGUERA,          | ) |                            |                  |
|                                    | ) |                            |                  |
| Defendants.                        | ) |                            |                  |

THE UNITED STATES GRAND JURY CHARGES THAT:

COUNT 1

(Conspiracy to Possess With Intent to Distribute Cocaine)

On or about September 6, 2011, in the State and District of Minnesota, the defendants,

**ROBERTO JESUS AMIGON-ARAGON and  
MIGUEL MORAN-HELGUERA,**

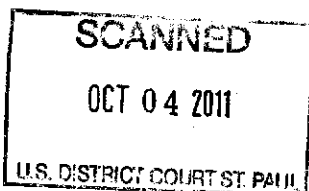
did unlawfully, knowingly and intentionally conspire with each other, and with others known and unknown to the grand jury, to possess with intent to distribute a mixture and substance containing a detectable amount of cocaine, a controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C) and 846.

COUNT 2

(Possession With Intent to Distribute Cocaine)

On or about September 6, 2011, in the State and District of Minnesota, the defendant,

**MIGUEL MORAN-HELGUERA,**



**OCT 04 2011**  
FILED  
RICHARD D. SLETTER, CLERK  
JUDGMENT ENTD.  
DEPUTY CLERK

United States v. Roberto Jesus Amigon-Aragon, et al.

did unlawfully, knowingly and intentionally possess with intent to distribute a mixture and substance containing a detectable amount of cocaine, a controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

**COUNT 3**

(Possession With Intent to Distribute Cocaine)

On or about September 6, 2011, in the State and District of Minnesota, the defendants,

**ROBERTO JESUS AMIGON-ARAGON and  
MIGUEL MORAN-HELGUERA,**

each aiding and abetting the other, did unlawfully, knowingly and intentionally possess with intent to distribute a mixture and substance containing a detectable amount of cocaine, a controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C), and Title 18, United States Code, Section 2.

**COUNT 4**

(Attempted Destruction of Property to Prevent Seizure)

On or about September 6, 2011, in the State and District of Minnesota, the defendant,

**ROBERTO JESUS AMIGON-ARAGON,**

before and during the search of the real property and premises known as XXXX, Eagan, Minnesota, by Special Agent Michael R. Peterson, United States Department of Homeland Security, a person authorized to make searches and seizures, did unlawfully, knowingly

United States v. Roberto Jesus Amigon-Aragon, et al.

and intentionally attempt to destroy, damage, waste and dispose of a mixture and substance containing a detectable amount of cocaine, a controlled substance, for the purpose of preventing and impairing the government's lawful authority to take such property into its custody and control and to continue holding such property under its lawful custody and control, in violation of Title 18, United States Code, Section 2232(a).

**FORFEITURE ALLEGATION**

If convicted of any of Counts 1 through 3 of this indictment, the defendants,

**ROBERTO JESUS AMIGON-ARAGON and  
MIGUEL MORAN-HELGUERA,**

shall forfeit to the United States any property constituting, or derived from, any proceeds they obtained, directly or indirectly, as the result of such violations; any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of such violations; and any substitute for such property under Title 21, United States Code, Section 853(p), including, but not limited to approximately \$9,411.00 in United States currency seized on September 6, 2011; all pursuant to Title 21, United States Code, Section 853.

A TRUE BILL

\_\_\_\_\_  
UNITED STATES ATTORNEY

\_\_\_\_\_  
FOREPERSON